

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

NETLIST, INC.

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,  
SAMSUNG ELECTRONICS AMERICA, INC.  
and SAMSUNG SEMICONDUCTOR, INC.,

Defendants.

Civil Case No. 2:22-cv-00293-JRG

**DEFENDANTS' UNOPPOSED MOTION TO FILE UNDER SEAL**

Pursuant to Eastern District of Texas Local Rule 5(a)(7)(C), Defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Semiconductor, Inc. (“Samsung”), move to file the following documents under seal: Samsung’s Reply in Support of Opposed Motion to (1) Sever and Transfer the ’912 Patent to The N.D. Cal.; and (2) Stay The Remaining Patents Pending Ninth Circuit Appeal, or (3) Alternatively, Consolidate With Civil Action No. 2:21-Cv-463 (Dkt. No. 21). There is good cause for this document to be filed under seal. There is currently no Protective Order entered in this matter, and the Reply contains sensitive information relating to business operations, including information regarding license agreements, which is deemed confidential. Accordingly, to preserve the confidentiality of that information, Samsung requests the document identified above be filed under seal.

Date: October 12, 2022

Respectfully submitted,

/s/ Melissa R. Smith

Ruffin B. Cordell

TX Bar No. 04820550

cordell@fr.com

Michael J. McKeon

D.C. Bar No. 459780

mckeon@fr.com

Lauren A. Degnan

DC Bar No. 452421

degnan@fr.com

Daniel A. Tishman

DC Bar No. 1013923

tishman@fr.com

FISH & RICHARDSON P.C.

1000 Maine Avenue, SW

Washington, DC 20024

Telephone: (202) 783-5070

Facsimile: (202) 783-2331

Francis J. Albert

CA Bar No. 247741

albert@fr.com

John W. Thornburgh

CA Bar No. 154627

thornburgh@fr.com

FISH & RICHARDSON P.C.

12860 El Camino Real, Ste. 400

San Diego, CA 92130

Telephone: (858) 678-5070

Facsimile: (858) 678-5099

Melissa Richards Smith

melissa@gillamsmith.com

GILLAM & SMITH, LLP

303 South Washington Ave.

Marshall, Texas 75670

Telephone: (903) 934-8450

Facsimile: (903) 934-9257

*Attorneys for Defendants Samsung Electronics  
Co., Ltd.; Samsung Electronics America, Inc.;  
and Samsung Semiconductor, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on October 12, 2022, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Melissa R. Smith

Melissa R. Smith

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel for Defendants met and conferred with counsel for Plaintiff. Counsel for Plaintiff indicated that it is unopposed to this motion.

/s/ Melissa R. Smith

Melissa R. Smith